

IN THE CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE
TWENTIETH JUDICIAL DISTRICT AT NASHVILLE

2008 FEB 29 PM 3:12

STATE OF TENNESSEE, *ex rel.*
ROBERT E. COOPER, JR., ATTORNEY
GENERAL and REPORTER,

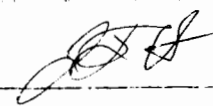
Plaintiff,

v.

ELMER VIRULA, individually and doing
business as TPS TAX PROFESSIONAL
SERVICES, INC., and OFFICE
PROFESSIONAL SERVICES, INC.; TPS
TAX PROFESSIONAL SERVICES, INC.,
a Tennessee corporation; and OFFICE
PROFESSIONAL SERVICES, INC., a
Tennessee corporation,

Defendants.

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No. _____

MOTION FOR EXPEDITED STATUTORY TEMPORARY INJUNCTION HEARING

The State of Tennessee, by and through its Attorney General and Reporter, Robert E. Cooper, Jr., moves this Honorable Court to set an expedited hearing on the State's Motion for Statutory Temporary Injunction in this matter given there is reason to believe that Defendants have (1) misrepresented to consumers that Defendant Elmer Virula is an attorney and certified public accountant in the State of Tennessee, (2) mislead consumers regarding their ability to provide legal services such as immigration document preparation, (3) promised they can provide valid government documents, i.e. a marriage license but instead produced falsified government

records to consumers and (4) promoted notary public or notario publico services without the statutorily required conspicuous notice.

Consumers could be substantially harmed by their reliance on the goods and services provided by Defendants. Consumers believe the purported marriage certificates provided by Defendants confer rights associated with a legal marriage. Acting on that belief, consumers could file joint tax returns and apply for citizenship based on the marriage. If the marriage is found to be void, these consumers could face substantial legal consequences. It is in the public interest to prevent Defendants from continuing to offer these goods and services to avoid these substantial harms.


The State is simultaneously filing its Motion for Statutory Temporary Injunction and Exhibits, the Memorandum in Support, and a proposed Order setting the hearing on its Motion for Statutory Temporary Injunction.

The State submits that exigent circumstances exist because of Defendants' falsification of governmental records (*i.e.*, marriage licenses) and that a hearing needs to be set as soon as possible.

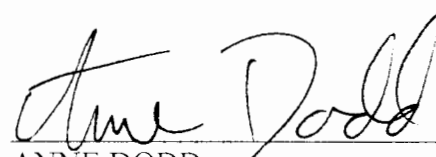
The State further moves, that given the exigent circumstances, any applicable local rules or rules of civil procedure should be waived for good cause, permitting this hearing to be handled in an expedited manner and permitting this pleading and the Order setting the hearing and other orders relating to the State's Motion for Statutory Temporary Injunction to be served via facsimile or overnight express courier service on Defendants or, if Defendants obtain counsel, through their counsel, though the State will provide an original sent via United States Mail.

Respectfully submitted,

ROBERT E. COOPER, JR.
Attorney General & Reporter
B.P.R. No. 010934



JEFFREY L. HILL
Senior Counsel
B.P.R. No. 16731



ANNE DODD
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Consumer Advocate and Protection Division
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(615) 741-2614 (phone)
(615) 532-2910 (fax)

Attorneys for the Plaintiff, State of Tennessee

CERTIFICATE OF SERVICE

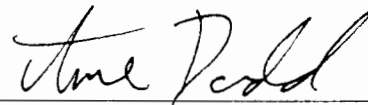
I, Anne Dodd, do hereby certify that the foregoing document will be served on Defendants via personal service to:

Elmer Virula
4733 Billingsgate Road
Antioch, Tennessee 37013

TPS Tax Professional Services
86 Thompson Lane
Nashville, Tennessee 37210

Office Professional Services
Attn: Elmer Virula
2179 Nolensville Pike
Nashville, Tennessee 37211

on this the 29 day of February, 2008.

A handwritten signature in cursive script, appearing to read "Anne Dodd", written over a horizontal line.

ANNE DODD
Assistant Attorney General